

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

HIGHLAND CAPITAL MANAGEMENT,  
L.P.,

Chapter 11

Case No. 19-12239 (CSS)

**NOTICE OF APPEARANCE AND REQUEST FOR ELECTRONIC NOTICE  
FOR UNITED STATES GOVERNMENT ATTORNEY MICHAEL I. BAIRD**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), an agency of the United States Government and a creditor in the above-captioned cases, hereby files this notice of appearance and request for electronic notice pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court concerning the above-captioned cases and debtors be given to and served upon PBGC as listed below.

This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and any other documents brought before this Court in these cases, whether formal or informal, ex parte or on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that this entry of appearance and request for notice is without prejudice to PBGC’s rights, remedies, and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of these cases, and shall not be deemed or construed to be a waiver of PBGC’s rights: (i) to have final orders and

non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any proceedings so triable in these cases or in any controversy or proceeding related to these cases, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC expressly reserves.

Dated: October 23, 2019  
Washington, D.C.

Respectfully submitted,

/s/ Michael I. Baird

Michael I. Baird, Attorney  
Bar No. DC 479180  
Pension Benefit Guaranty Corporation  
Office of the General Counsel  
1200 K Street, N.W.  
Washington, D.C. 20005-4026  
Telephone: 202-326-4000, ext. 6222  
Fax: 202-326-4112  
Emails: baird.michael@pbgc.gov and  
efile@pbgc.gov